

**IN THE UNITED STATES OF AMERICA
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

Carmen Purl, M.D.; and Carmen Purl, M.D., PLLC d/b/a Dr. Purl's Fast Care Walk In Clinic,

Plaintiffs,

v.

United States Department of Health and Human Services; Xavier Becerra, in his official capacity as Secretary of the United States Department of Health and Human Services; Office for Civil Rights of the United States Department of Health and Human Services; and Melanie Fontes Rainer, in her official capacity as Director of the Office for Civil Rights of the United States Department of Health and Human Services,

Defendants,

and

City of Columbus, Ohio; City of Madison, Wisconsin; and Doctors for America,

*Proposed Intervenor-
Defendants.*

Civil Action No. 2:24-cv-00228

**PROPOSED INTERVENOR-DEFENDANTS' RESPONSE IN OPPOSITION
TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Rule 56.4, Proposed Intervenor-Defendants the City of Columbus, Ohio, the City of Madison, Wisconsin, and Doctors for America oppose Plaintiffs' Motion for Summary Judgement on Counts I and II of their Complaint (ECF 1). This Response is supported by Proposed Intervenor-Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Summary Judgement, which sets

forth the arguments and authorities on which Intervenor-Defendants rely and contains the matters required by Local Rule 56.4.

Date: March 3, 2025

Respectfully submitted,

/s/ Shannon R. Selden

Shannon Rose Selden—*Admitted Pro Hac Vice*
Adam Aukland-Peck—*Admitted Pro Hac Vice*
DEBEVOISE & PLIMPTON LLP
66 Hudson Boulevard
New York, New York 10001
(212) 909-6000 (phone)
(212) 909-6836 (fax)
srselden@debevoise.com
aauklandpeck@debevoise.com

Counsel to Proposed Intervenor-Defendants

-and-

Anna A. Moody—*Admitted Pro Hac Vice*
Gabriel A. Kohan—*Admitted Pro Hac Vice*
DEBEVOISE & PLIMPTON LLP
801 Pennsylvania Avenue NW
Washington, DC 20004
(202) 383-8000 (phone)
(202) 383-8118 (fax)
amoody@debevoise.com
gakohan@debevoise.com

Counsel to Proposed Intervenor-Defendants

-and-

Aisha Rich—*Admitted Pro Hac Vice*
PUBLIC RIGHTS PROJECT
490 43rd Street, Unit #115
Oakland, California 94609
(510) 214-6960 (phone)
aisha@publicrightsproject.org

Counsel to City of Columbus and City of Madison

Ryan Patrick Brown
RYAN BROWN ATTORNEY AT LAW
P.L.L.C
1222 S. Fillmore
Amarillo, Texas 79101
(806) 372-5711 (phone)
ryan@ryanbrownattorneyatlaw.com

Counsel to Proposed Intervenor-Defendants

CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2025, a copy of the foregoing was filed electronically via the Court's ECF system, which effects service upon counsel of record.

/s/ Shannon R. Selden
Shannon Rose Selden